

REQUIRED STATEMENT TO ACCOMPANY
ALL MOTIONS FOR RELIEF FROM STAY

Genoveva P. Jordanov *aka Gina
Jordanov and Alexander G.*

All Cases: Debtor(s) Jordanov *aka Alex Jordanov* Case No. 17-33927 Chapter 13
All Cases: Moving Creditor Pingora Loan Servicing, LLC Date Case Filed 11/13/2017
Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☐ Other (describe) _____
Chapter 13: Date of Confirmation Hearing _____ Or Date Plan Confirmed 03/28/2018
Chapter 7: ☐ No-Asset Report Filed on _____
☐ No-Asset Report not filed, Date of Creditors Meeting _____

1. Collateral
a. ☒ Home
b. ☐ Car Year, Make, and Model _____
c. ☐ Other (describe) _____

2. Balanced Owed as of June 10, 2019 \$183,528.62, principal balance, \$186,492.40 payoff balance
Total of all other Liens against Collateral _____

3. In Chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition:
Payment History attached as Exhibit E

4. Estimated Value of Collateral (must be supplied in *all* cases) \$282,000.00 based on Debtor Schedule A/B

5. Default
a. ☐ Pre-Petition Default
Number of months _____ Amount _____
b. ☒ Post-Petition Default
i. ☒ On direct payments to the moving creditor
Number of months 3 Amount \$5,171.62
ii. ☐ On payments to the Standing Chapter 13 Trustee
Number of Months _____ Amount _____

6. Other Allegations
a. ☐ Lack of Adequate Protection § 362(d)(1)
i. ☐ No insurance
ii. ☐ Taxes unpaid Amount _____
iii. ☐ Rapidly depreciating asset
iv. ☐ Other (describe) _____

b. ☐ No Equity and not Necessary for an Effective reorganization § 362(d)(2)

c. ☐ Other "Cause" § 362(d)(1)
i. ☐ Bad Faith (describe) _____
ii. ☐ Multiple Filings
iii. ☐ Other (describe) _____

d. Debtor's Statement of Intention regarding the Collateral
i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention Filed

Date: June 25, 2019 /s/ Kenneth W. Bach
Counsel for Movant